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Attorneys for Defendant,
DBEST PRODUCTS, INC.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ECR4KIDS, L.P.,

Plaintiff,

v.

DBEST PRODUCTS, INC.

Defendant.

CIVIL ACTION NO. 23-2675-MCA-LDW

**DECLARATION OF EHAB M. SAMUEL IN
SUPPORT OF DBEST PRODUCTS, INC.'S
MOTION TO DISMISS.**

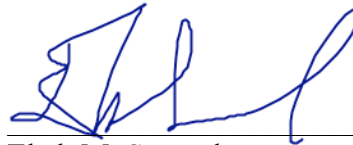
I, Ehab M. Samuel, declare as follows:

1. I am an attorney licensed to practice in all courts of the state of California and partner at Orbit IP, LLP, in Los Angeles, California. I represent defendant dbest products, Inc. and expect to file a motion for admission *pro hac vice* in the above-referenced matter. Unless otherwise stated, I have personal knowledge of the facts set forth herein.

2. On October 20, 2023, I sent a letter to Jay DiMarino, counsel for ECR4Kids, containing dbest's covenant not to sue ECR4Kids for patent infringement.

3. A true and correct copy of my letter is attached as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 25, 2023.

A handwritten signature in blue ink, appearing to be 'Ehab M. Samuel', written over a horizontal line.

Ehab M. Samuel